



January 28, 2020

BY EMAIL (dobinson.thomas@epa.gov) AND FIRST CLASS MAIL

Thomas Dobinson, P.E.
Remedial Project Manager
Superfund and Emergency Management Division
New Jersey Remediation Branch
U.S. Environmental Protection Agency/Region 2
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Solvay Groundwater Sampling at Matteo & Sons, Inc. Property, West Deptford, NJ

Dear Mr. Dobinson:

This letter responds to your letter dated January 7, 2020 addressed to Dr. Phil Goodrum, who was formerly associated with Integral Consulting, Inc. ("Integral"). Integral represents Solvay Specialty Polymers USA, LLC ("Solvay") in certain PFAS-related matters in the West Deptford, NJ area. Although no longer with Integral, Dr. Goodrum helpfully forwarded your letter to Solvay on January 16, 2020, for response. I am the appropriate Solvay contact for any future communications concerning this matter.

We appreciate EPA's engagement on PFAS issues at the Matteo & Sons, Inc. site ("Matteo Site") and look forward to further discussing these issues with EPA. You are correct that Integral, on behalf of Solvay, sampled and analyzed groundwater at the Matteo Site for PFAS compounds in September 2019. (Integral, on behalf of Solvay, had previously sampled the potable well on the Matteo Site in 2014 and provided the results to EPA and NJDEP.) Prior to the most recent sampling, Solvay requested and obtained written consent for access from the sole property owner, in accordance with New Jersey's statutory and regulatory provisions under the New Jersey Spill Compensation and Control Act ("Spill Act") concerning offsite access, after negotiating an appropriate access agreement with the property owner. (See attached signed Access Agreement dated July 30, 2019). We were not aware of any incremental EPA access protocols. Please forward these protocols to my attention for review when you can. We would be happy to engage with EPA regarding any follow-up Matteo Site access to the extent necessary.

Enclosed on a CD with the hard copy version of this letter are copies of the requested documents, to the extent they exist, concerning the sampling and analysis performed for Solvay at the Matteo Site to date. As discussed below, some of this information, in summary form, was previously transmitted to EPA. In addition, for your reference, nearly three years ago, Solvay urged EPA (and NJDEP) to begin investigating the Matteo Site as a likely PFAS source, based on sampling data collected up to that time which suggested this suspected conclusion. See March 29, 2017

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Letter from P. Goodrum to L. Granite and enclosures, attached. As far as we are aware, neither NJDEP nor EPA has undertaken any PFAS investigation activity of the Matteo Site to date. If we are incorrect, please let us know so we may file an appropriate FOIA (or OPRA) request, since Solvay wishes to understand and remain abreast of all available information on PFAS issues concerning the Matteo Site.

In any event, the data from our September 2019 sampling event confirm that there is a PFAS source at the Matteo Site. As a result, and in compliance with New Jersey law, those sampling results were called in to the NJDEP's Hotline. We also previously transmitted the results to both the NJDEP and EPA. *See* October 25, 2019 Email from E. Palko to E. Bergman, copied to L. Granite, attached.

Solvay's continued hope and expectation is that EPA (and NJDEP) will follow up on the most recent data provided by Integral and will perform an investigation, or require an investigation by the responsible party, on the source of PFAS at the Matteo Site, consistent with EPA's December 19, 2019 Interim Recommendations to Address Groundwater Contaminated with Perfluorooctanoic Acid and Perfluorooctanesulfonate, EPA's PFAS Action Plan, and NJDEP's own regulations and guidance concerning PFAS in groundwater.

We will follow up with you to discuss EPA's plan to address this issue and the data that Solvay has gathered from the Matteo Site. To help facilitate our intended follow up, please confirm whether you are the primary EPA contact with regard to future communications regarding the Matteo Site.

Sincerely,



Mitch Gertz

cc: Erica Bergman, NJDEP
Erin Palko, Integral

Enclosures: Executed Access Agreement with James Matteo & Sons, Inc.;
March 29, 2017 Letter from Integral to EPA Region 2 and enclosures;
October 25, 2019 Email from Integral to NJDEP and EPA Region 2 and enclosures;
CD (with first class mail version only) containing electronic data deliverable files, analytical laboratory reports, field sampling forms for low flow sampling, summary of groundwater gauging, and equipment calibration reports in connection with September 2019 sampling event